## To Whom It May Concern:

I would like to comment on the proposed FTC rule addressing the regulation of the industry that compromises small/home based businesses.

I have been a Quixtar affiliated IBO for the last 5 years. In that time my wife and I have had the opportunity to build a business to secure our family's financial future in the face of an increasingly unstable economy. Supported by World Wide Dream Builders, and guided by our upline coaches and mentors, we have been able to set in place the foundation of a business that is poised to take advantage of the shift in the economy towards an ecommerce environment.

As busy parents with full time jobs I am not aware of any other business that would have provided us with the same opportunity. Anything that required a large capital investment, a significant time requirement, rigid schedule, additional education or schooling, an extensive business back ground, or risked our family's financial stability would have precluded our involvement. The Quixtar business opportunity offered *none of these obstacles*. Our affiliation with Quixtar, in conjunction with WWDB, has had an impact that reaches far beyond financial. Person to person communication, goal setting, business education, and future planning are just a few of the areas in our lives that have flourished as a result of us building our business.

I fully support regulation that levels the playing field in our industry. Rules that hold <u>all</u> participants accountable, regardless of the business, for claims and conduct would be a welcome addition. However, I feel that some of the items in the draft, as it currently stands, would place an undue burden on new and existing business builders within our industry.

First, because of technology and the availability of information, business today can, and does, happen at a very rapid pace. A regulation requiring a 7 day waiting period prior to an individual launching their business will hinder their ability to get a fast start. This ability to start fast, and build fast, is many times what attracts individuals to our industry. There is no store to build or renovate, no endless forms to fill out or licenses to apply for. A new IBO knows that they can launch their business, take their future in their own hands and start building that day. Instead of a 7 day waiting period, a reasonable money back/cancellation policy would provide protection to those who may reconsider their decision to become IBOs.

Next, the rule requiring the sponsoring IBO to provide a list of references to the prospective IBO creates several potential issues. First, as a couple that has built a successful franchise, my wife and I's names might be one of those passed on to prospective IBOs. While I would welcome questions regarding my experience at a business meeting or seminar, our business is meant to be built *around* our families and regular lives. To have people that I don't know calling at anytime day or night, while I'm at work or play, would impact myself and my family in a negative way. This kind of intrusion is why we have Federal "Do Not Call" lists and the option to opt out of such contact. Second, our industry is built by seeking out and sponsoring individuals that are looking to start their own business. The time and effort that goes into identifying that person and creating that relationship are valuable commodities. To put a potential prospect in contact with another IBO that *may or may not* respect that relationship, and

may only see an individual that they can sponsor, creates a significant risk to that investment of time and effort.

In regards to the disclosure of current and past litigation, this provision is unreasonable. First, the definition of what entities involved in litigation that must be included in such a list is extremely vague. Second, just because a case was brought, in no way shows that case was warranted or valid. How is a prospective IBO, most of whom have no real legal background, supposed to sort fact from fiction in such a situation. A simple review of items noted by the FTC and the Better Business Bureau, which are available to any and all that ask, seems sufficient for this purpose.

Finally, the purposed disclosure of financial records creates an invasion of personal privacy and a potential hindrance to the new IBO. A Quixtar IBO has the opportunity to create any level of income based off of the time and effort they are willing to put into their new business. Over the last 5 years I have seen this prove itself out multiple times. The income that my business has produced is based off of multiple variables. Work habit, retail pricing, business structure and teach ability are all things that play into the success of my business. Some individuals are ready to take the business and run with it. Some are not. Those that are, will generate a much more significant income than I have in a shorter amount of time. Those that are not may take longer, but have the same incredible opportunity available to them when they are ready to take advantage of it. To give the impression that my results are indicative, in any way, of that new persons' ability to succeed, creates the risk of diminishing the expectations of the ones that start more prepared than I was. And, on the flip side, there is the risk of intimidating those that are not as prepared into not even making the attempt. In both of these situations the loser is the new IBO. Instead, a clear, simple, industry wide, standardized income discloser that is delivered to all prospective IBOs would be of a greater benefit to everyone.

Thank you for taking the time to review my comments. I truly look forward to reviewing the finished draft of what I am sure will be a huge step forward for all legitimate businesses in our industry.

Sincerely,

Eric Link